

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

|                          |   |                 |
|--------------------------|---|-----------------|
| DALLAS BUYERS CLUB, LLC, | ) |                 |
|                          | ) |                 |
| Plaintiff,               | ) |                 |
|                          | ) |                 |
| v.                       | ) | No.             |
|                          | ) | 3:15-CV-0907-AC |
| JOHN HUSZAR,             | ) |                 |
|                          | ) |                 |
| Defendant.               | ) |                 |

30(b)(6) DEPOSITION OF ROBERT D. YOUNG  
Taken in behalf of Defendant  
January 2, 2018

\*\*\* Contains confidential testimony \*\*\*  
\*\*\* Pages 53-79 \*\*\*

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Robert Young - 1/2/2018

1 ROBERT D. YOUNG,  
2 having first been sworn to tell the truth by the  
3 reporter, testified under oath as follows:  
4

08:54 5 MR. CROWELL: On the record, we're here in  
6 response to your 30(b)(6) notice to Dallas Buyers  
7 Club for issues on -- I have the defendant's notice  
8 dated November 17th. So one topic, items A through  
9 G, Dallas Buyers Club is responding by producing  
08:55 10 third-party Robert Young who's been recently educated  
11 as to all matters reasonably available to Dallas  
12 Buyers Club on your topics to the extent there are  
13 appropriate responses.

14 I've presented to you today with a  
08:55 15 five-page response to your 30(b)(6) notice outlining  
16 texturally responses to each of your topics. And you  
17 have a number of exhibits -- I believe it's A through  
18 G -- to the plaintiff's 30(b)(6) response.

19 And I believe you've already made at least  
08:55 20 one extra copy of that -- those documents; correct?

21 MR. EDMONDSON: Well, they're being copied  
22 right now, so if we use them, then we'll attach them  
23 as exhibits.

24 MR. CROWELL: Do you have it in front of  
08:55 25 you as well?

Robert Young - 1/2/2018

1 MR. CROWELL: I mean are you looking for a  
2 handful of questions to be done for the day?

3 MR. EDMONDSON: No. During lunch I'm  
4 going to review these reports that you gave me, so --

11:44 5 MR. CROWELL: Mr. Madden, let's go ahead  
6 and finish with you, and then you can be done for the  
7 day, and we can go back to Mr. Edmondson, unless  
8 Mr. Toth wants to ask questions as well.

9 MR. EDMONDSON: We'll see.

11:44 10 BY MR. MADDEN:

11 Q. You may have covered this with Curt. Did you  
12 ever personally run the Maverick program that you had  
13 the source code for?

14 A. No.

11:45 15 Q. Did you set up a test network in which  
16 BitTorrent activity could take place and observe  
17 activity in that network?

18 A. No.

19 MR. MADDEN: Okay. That's what I wanted  
11:45 20 to ask.

21 MR. EDMONDSON: Okay.

22

23 FURTHER EXAMINATION

24 BY MR. EDMONDSON:

11:45 25 Q. Looking at Exhibit 6 there, Mr. Young, based on